TTFCC Comments CC Docket 95-155 NSD-L-00-249 December 13, 2000

Attachment A

Letters in Support of TTFCC Position



Business Markets Division, RSL COM U.S.A., Inc.

Ms. Dorothy Attwood, Chief Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

> Re: Fair and Equitable Distribution of Toll Free Numbers Support for The Toll Free Commerce Coalition Ex Parte Communication CC Docket No. 95-155

Dear Ms. Attwood:

We hereby support The Toll Free Commerce Coalition ("TTFCC") and the Toll Free Number Coalition ("TFNC") in their efforts to ensure that all future releases of toll free service access codes, including 855, are conducted in a fair and equitable manner as mandated by the Federal Communications Commission ("FCC" or "Commission"). We encourage the Commission to remedy the issues raised by TTFCC in its "Petition for Emergency Relief" filed on November 13, 2000 and the issues raised by TFNC in its "Petition for Emergency Relief" filed on November 9, 2000, as well as other pending issues relating to the policies and procedures by which the Commission, through its designated administrator, Database Service Management, Inc. ("DSMI"), releases toll free numbers in new service access codes.

We believe it is inequitable that the SMS800 toll free number administration system provides MGI equipped Responsible Organizations an advantage over all other Responsible Organizations in reserving the most highly sought after toll free numbers. The advantage given MGI equipped Responsible Organizations is manifested only during the high activity demand placed on the SMS800 system immediately following the release of new toll free service access codes. On July 29, 2000, during the release of toll free access code 866 our non-MGI electronic access to the SMS800 system was essentially inoperative for substantial periods during at least the first 20 minutes immediately following the release of 866. During the periods when the SMS800 system was non-responsive, we were unable to submit reservation requests for toll free 866 numbers. When the SMS800 system did respond to our reservation requests many if not all of our highest priority 866 numbers were already reserved.

We request that the Commission conduct an investigation of the number reservation advantage provided to MGI equipped Responsible Organizations by the SMS800 system. We request that the Commission's investigation include an accounting of the number of reservation requests processed by DSMI for each of the approximately 250 Responsible Organizations during each of the first 60 critical minutes following the release of 866. This data should illustrate the inordinate preference given to MGI equipped Responsible Organizations reservation requests over all other



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reservation requests. The accounting of 866 number reservation activity on July 29, 2000 should also include the number of reservation requests submitted for the same 866 numbers by different Responsible Organizations; this information should help illustrate the inordinate demand for certain numbers and should help demonstrate that MGI Responsible Organizations are able to reserve an overwhelming portion of these most highly prized toll free numbers.

We encourage the Commission to resolve these pending issues prior to authorizing the release of any additional toll free access codes including 855. We are a Responsible Organization (Resp Org ID: WST01) authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the outcome of this proceeding.

Luella

Sincerely,

Marcy Lavella

cc: Bennet & Bennet

TTFCC

IOWA TELECOMMUNICATIONS & TECHNOLOGY COMMISSION

THOMAS J. VILSACK
GOVERNOR

SALLY J. PEDRASON LT. GOVERNOR BITTY BRANDSDARD, CHAIRPERSON RICHARD D. JOHNSON TIMOTILY L. LAPOINTE MARY A. NELSON RICHARD H. OPTE MARK J. SCHOUTEN

Iowa Communications Network
PO Box 587

JOHNSTON, IA 50131-0587

Ms. Dorothy Attwood, Chief Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re

Fair and Equitable Distribution of Toll Free Numbers Support for The Toll Free Commerce Coalition Ex Parte Communication CC Docket No. 95-155

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reservation requests over all other reservation requests. The accounting of 866 number reservation activity on July 29, 2000 should also include the number of reservation requests submitted for the same 866 numbers by different Responsible Organizations; this information should help illustrate the inordinate demand for certain numbers and should help demonstrate that MGI Responsible Organizations are able to reserve an overwhelming portion of these most highly prized toll free numbers.

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Sincerely

cc:

Bennet & Bennet TTFCC



Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Fair and Equitable Distribution of Toll Free Numbers Support for The Toll Free Commerce Coalition Ex Parte Communication CC Docket No. 95-155

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We encourage the Commission to resolve these pending issues prior to authorizing the release of any additional toll free access codes including 855. We are a Responsible Organization (Resp Org ID: IVN01) authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the outcome of this proceeding.

Sincerely,

Janis Hoyer
Telco Manager
XO Communications

cc: Bennet & Bennet

TTFCC



BUS. (970) 226-2999 • FAX (970) 226-4568 • 1-800-754-1001 SCOTCH PINES VILLAGE OFFICES • 2601 S. LEMAY • SUITE 36 • FT. COLLINS, CO 80525

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Support for The Toll Free Commerce Coalition
Ex Parte Communication
CC Docket No. 95-155

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Sincerely

Shawnee Emorey

Corporate Acministrator

CC: Benn 2 & Bennet
TTFCC

ABCO Communications, Inc.

1135 South A Street Santa Rosa, CA 95404-5407 707-591-0151 RESP ORD ID# ABC01

December 7, 2000

Ms. Dorothy Attwood, Chief Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

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Support for The Toll Free Commerce Coalition
Ex Parte Communication
CC Docket No. 95-155

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We encourage the Commission to resolve these pending issues prior to authorizing the release of any additional toll free access codes including 855. We are a Responsible Organization (Resp Org ID: _____) authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the outcome of this proceeding.

Sincerely

Robert M. Zoglin

President

cc: Bennet & Bennet

TTFCC



December 7, 2000

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authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the outcome of this

proceeding.

Sincerely,

Janis L. Farrell

Manager, Number Portability Services

BTI

cc: Bennet & Bennet



11101 Metric Blvd. Suite 821 A Austin, Texas 78758 phone 800.555.5022 fax 888.464.6147 www.broadwing.com

Ms. Dorothy Attwood, Chief Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

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Fair and Equitable Distribution of Toll Free Numbers
Support for The Toll Free Commerce Coalition

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We encourage the Commission to resolve these pending issues prior to authorizing the release of any additional toll free access codes including 855. We are a Responsible Organization (Resp Org ID: IXC01, DBC01, CXT01, DCT01) authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the outcome of this proceeding.

Janiedmodwing Communications

Sincerely.

Questar InfoComm, Inc. 180 East 100 South

Salt Lake City, UT 84145-0433

P.O. Box 45433

QUESTAR

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Sincerely, Janen S. Spance

Karen S. Spencer

Sr. Communications Engineer

Questar InfoComm, Inc.

11 East 700 South Salt Lake City, UT 84111

Fax: (801) 324-1959

Phone: (801) 324-1924

Email: KarenS@questar.com

cc:

Bennet & Bennet

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Sincerely,

Andy Kaps Vice President

cc: Bennet & Bennet TTFCC



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Dec-11-00 9:20AM;



Sent By: POINTONE;

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Danny Davis

Sincerety

800 Database Programmer
PointOne Telecommunications

ddavis@pointone.com

cc: Bennet & Bennet

TTFCC

Premiere Network Services Inc.

"For Your Information...We've Got Connections!" is



From the Desk of

Jacquetta L. Peace

Director - Legal & Regulatory / Special Projects

1510 N. Hampton Road - Suite 120 * DeSoto, TX 75115 Direct: (972) 228-6810 **FAX (972) 228-8889 http://www.rewireit.com

December 7, 2000

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Sincerely,

JACQUETTA PEACE

cc: Bennet & Bennet TTFCC

3925 N. I-10 SERVICE RD. WEST SUITE 223 METAIRIE, LOUISIANA 70002-5858



11500 NORTHWEST FREEWAY 8UITE 178 HOUSTON, TEXAS 77092-8519

Ms. Dorothy Attwood, Chief Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

e: Fair and Equitable Distribution of Toll Free Numbers

Support for The Toll Free Commerce Coalition

Ex Parte Communication CC Docket No. 95-155

Dear Ms. Attwood:

We hereby support The Toll Free Commerce Coalition ("TTFCC") and the Toll Free Number Coalition ("TFNC") in their efforts to ensure that all future releases of toll free service access codes, including 855, are conducted in a fair and equitable manner as mandated by the Federal Communications Commission ("FCC" or "Commission"). We encourage the Commission to remedy the issues raised by TTFCC in its "Petition for Emergency Relief" filed on November 13, 2000 and the issues raised by TFNC in its "Petition for Emergency Relief" filed on November 9, 2000, as well as other pending issues relating to the policies and procedures by which the Commission, through its designated administrator, Database Service Management, Inc. ("DSMI"), releases toll free numbers in new service access codes.

We believe it is inequitable that the SMS800 toll free number administration system provides MGI equipped Responsible Organizations an advantage over all other Responsible Organizations in reserving the most highly sought after toll free numbers. The advantage given MGI equipped Responsible Organizations is manifested only during the high activity demand placed on the SMS800 system immediately following the release of new toll free service access codes. On July 29, 2000, during the release of toll free access code 866 our non-MGI electronic access to the SMS800 system was essentially inoperative for substantial periods during at least the first 20 minutes immediately following the release of 866. During the periods when the SMS800 system was non-responsive, we were unable to submit reservation requests for toll free 866 numbers. When the SMS800 system did respond to our reservation requests many if not all of our highest priority 866 numbers were already reserved.

We request that the Commission conduct an investigation of the number reservation advantage provided to MGI equipped Responsible Organizations by the SMS800 system. We request that the Commission's investigation include an accounting of the number of reservation requests processed by DSMI for each of the approximately 250 Responsible Organizations during each of the first 60 critical minutes following the release of 866.

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11500 NORTHWEST FREEWAY SUITE 170 HOUSTON, TEXAS 77092-6519

This data should illustrate the inordinate preference given to MGI equipped Responsible Organizations reservation requests over all other reservation requests. The accounting of 866 number reservation activity on July 29, 2000 should also include the number of reservation requests submitted for the same 866 numbers by different Responsible Organizations; this information should help illustrate the inordinate demand for certain numbers and should help demonstrate that MGI Responsible Organizations are able to reserve an overwhelming portion of these most highly prized toll free numbers.

We encourage the Commission to resolve these pending issues prior to authorizing the release of any additional toll free access codes including 855. We are a Responsible Organization (Resp Org ID: BYS01) authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the outcome of this proceeding.

Sincerely,

George T Woodgate

CC:

Bennet & Bennet

TTFCC

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Ms. Dorothy Attwood, Chief Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

> Re: Fair and Equitable Distribution of Toll Free Numbers Support for The Toll Free Commerce Coalition Ex Parte Communication CC Docket No. 95-155

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We request that the Commission conduct an investigation of the number reservation advantage provided to MGI equipped Responsible Organizations by the SMS800 system. We request that the Commission's investigation include an accounting of the number of reservation requests processed by DSMI for each of the approximately 250 Responsible Organizations during each of the first 60 critical minutes following the release of 866. This data should illustrate the inordinate preference given to MGI equipped Responsible Organizations reservation requests over all other reservation requests. The accounting of 866 number reservation activity on July 29, 2000 should also include the number of reservation requests submitted for the same 866 numbers by different Responsible Organizations; this information should help illustrate the inordinate demand for certain numbers and should help demonstrate that MGI Responsible Organizations are able to reserve an overwhelming portion of these most highly prized toll free numbers.

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Sincerely, Steve Kowalski Resporg Administrator

cc: Bennet & Bennet

TTFCC



Ms. Dorothy Attwood, Chief
Common Carrier Bureau

Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Fair and Equitable Distribution of Toll Free Numbers
Support for The Toll Free Commerce Coalition
Ex Parte Communication
CC Docket No. 95-155

Dear Ms. Attwood:

December 12, 2000

We hereby support The Toil Free Commerce Coalition ("TTFCC") and the Toll Free Number Coalition ("TFNC") in their efforts to ensure that all future releases of toll free service access codes, including 855, are conducted in a fair and equitable manner as mandated by the Federal Communications Commission ("FCC" or "Commission"). We encourage the Commission to remedy the issues raised by TTFCC in its "Petition for Emergency Relief" filed on November 13, 2000 and the issues raised by TFNC in its "Petition for Emergency Relief" filed on November 9, 2000, as well as other pending issues relating to the policies and procedures by which the Commission, through its designated administrator, Database Service Management, Inc. ("DSMI"), releases toll free numbers in new service access codes.

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authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the outcome of this proceeding.

Sincerely,

Jesse McPherson

International Telcom, LTD.

206,479,2322 (phone)

206.479.4429 (fax)

http://www.itltd.net

cc: Bennet & Bennet

TTFCC

TTFCC Comments CC Docket 95-155 NSD-L-00-249 December 13, 2000

Attachment B

Minutes of SNAC Conference Call, November 3, 2000

SMS/800 NUMBER ADMINISTRATION COMMITTEE (SNAC)

Full SNAC Conference Call Issue 1727: 855 Implementation November 3, 2000 1:00 p.m. EDT Host: ATIS

I. WELCOME/CALL TO ORDER

Leslee Strohm, SNAC Co-Leader, welcomed the participants and called the meeting to order. The participants introduced themselves. A list of participants is attached to the meeting record. (Attachment 1)

II. AGENDA

The purpose of this call was to discuss the Go/No-Go for 855 ERC (Easily Recognized Code) based on the first-come, first-served functionality.

III. DISCUSSION

Points Noted:

- 1. It was noted that guest testing for 855 ERCs in the SMS took place on October 17, 2000. It was noted that the majority of the RespOrgs participated in the testing on October 17 and did not encounter any difficulties regarding the first-come, first-served functionality.
- 2. A question was asked if the SMT validated that the first-come, first-served functionality was working properly. It was noted, that during guest testing of 866 ERC, number reservation requests were not queued on a first-come, first-served basis and that the three interfaces (GUI, Online and MGI) received different priorities in their requests. In response it was noted that for the code opening of 866 ERC, three different transaction codes were assigned, one for each interface. It was further noted that the problem has now been resolved to guarantee a first-come, first-served for number requests by only using one transaction code for all requests. With the new SMS upgrade, requests received are now queued and processed in such a manner that first-come, first-served is guaranteed.
- 3. A question was asked if a testing scenario took place to where the different online users requested the same 855 number at the same time. In response it was noted that a specific scenario was not set up for the guest testing, but this scenario has been tested internally by Telcordia and the SMS has worked properly resulting in a first-come, first-served assignment.
- 4. It was suggested that, based on the information provided by the SMT as stated above, the SNAC should reach consensus on the "Go" for the 855 code opening.

Agreement Reached:

1. The SNAC agreed to move forward with the 855 code opening on November 18, 2000, 12:01 p.m. CST, based on the information received by the SMT that the functionality first-come, first-served is working properly.

Points Noted:

- 5. A participant asked if a bridge has yet been provided for the code opening date of November 18, 2000. No bridge has been provided.
- 6. It was suggested to have an SMT representative on the conference bridge during the code opening, who can address any questions or problems from the RespOrgs and also give the "go-ahead" for the code opening at 12:01 p.m. CST. In response the SMT noted that a vendor would be on the conference call bridge on November 18.

Action Items:

- 1. Jonnie Bond, AT&T, will provide to Heike Martin, ATIS, the bridge for the code opening. The bridge will be available starting at 11:40 a.m. CST.
- 2. Heike will post the information for the code opening to the ATIS calendar page and send an exploder notice to the SNAC.

IV. ADJOURN

Leslee thanked the attendees for their participation. The meeting was adjourned at 1:25 pm.

Submitted by
Heike Martin
ATIS
Committee Administrator

List of Participants:

(Attachment 1)

Jonnie Bond, AT&T

Judy Cook, Sprint

Mary Stapney, Sprint

Anne Griffith, Sprint

Carol Ryan, Bell Canada

Karen Colady, AT&T Canada

Robert St. Louis, AT&T Canada

Joe Rubio, WorldCom

Lauren Mason, SBC

Ellen Oteo, SMT Representative

Sandra Murray, 800 Response

Leslee Strohm, Qwest

Howard Grove, Verizon

Don McManus, Verizon

Judith Oppenheimer, ICB

Debra Jones, Pacific Bell

Vasantha Ananthakrishnan, Telcordia Technologies

Anil Patel, DSMI

Mike Wade, DSMI

Ted Fernandez, SMT Representative

Ron Pollard, SWB Data Center

Kris Vollmer, SMS/800 HelpDesk

Mike Nichols, ATIS

Deseree Herring, ATIS

Heike Martin, ATIS

TTFCC Comments CC Docket 95-155 NSD-L-00-249 December 13, 2000

Attachment C

Excerpts From SNAC/OBF Meeting #70, May 22-26, 2000

SMS/800 NUMBER ADMINISTRATION COMMITTEE (SNAC) OBF #70

May 22-26, 2000

Host: USWEST

I. WELCOME/CALL TO ORDER

Matt Peacock, Bell Canada, and Joan Saucedo, WorldCom, (SNAC Co-Leaders) welcomed participants to OBF #70. The participants introduced themselves and a list is attached. (Attachment 1)

II. REVIEW OF LEADERS/ADMINISTRATORS MEETING

Joan Saucedo reviewed the highlights of the meeting with the participants. (Attachment 2)

III. REVIEW AND APPROVAL OF OBF 70 AGENDA

Agreement Reached:

- 1. It was agreed to follow the OBF/SNAC #70 agenda (Attachment 3) with the addition of IV. Consensus Process.
- IV. CONSENSUS PROCESS Presentation by Megan Campbell, ATIS General Counsel (Attachment 4)

Points Noted:

- 1. Megan encouraged the Committee to refrain from scheduling conference calls with less than one week's notice. Megan noted that adequate time for review and approval of notes had to be provided.
- 2. A participant noted that the SNAC had to be very clear on the purpose of the calls. It was further noted that sometimes flexibility to schedule calls for a particular date and time was not available.
- It was noted that the SNAC had to be specific on the issues to be discussed during conference calls. It was suggested to send out a notice via exploder to inform the committee of the purpose of an upcoming conference call.
- 4. It was suggested to add language to the guidelines for conference calls and their adequate scheduling.

XII. DISCUSSION OF ISSUES IN INITIAL CLOSURE

Issue 1720 (formerly 1603): 866 Implementation

Action Item #7 of the April 25 conference call:

Jonnie Bond, AT&T will compose a letter draft to the FCC regarding code opening dates for discussion at the OBF #70.

This action item has been closed.

Action Item #5 of the May 1 conference call:

Jonnie Bond will hold off on the FCC letter draft regarding a potential code opening date for ERCs 866/855 for September 2, 2000 which resulted in Action Item #7 of the April 25 full SNAC conference call.

This action item has been closed.

Action Item #1 of the May 8 conference call:

Ellen Oteo will speak to Don Bender regarding the 2-week time frame to give notice to the carriers of an earlier code opening date.

Point Noted:

87. It was noted that this issue will be discussed at the June NSAC meeting, however, Megan Campbell talked to Don Bender, USTA and Don stated that given all companies were ready to proceed with the code openings on 4/1/00 and 4/8/00, 2 weeks notification of a code opening should be sufficient.

Action Item:

11. Megan Campbell will research the industry groups that were notified of the code opening for 877.

Action Item #1 of the May 12 conference call:

Anil Patel will contact Telcordia to find out what the status of incorporating Concept #2A in the 12.0 Release was.

Point Noted:

88. Anil Patel presented a slide on the proposed GA dates for the 12.0 and the 12.1 releases. It was noted that the current date for the 12.0 release is 2/24/01 and for the 12.1 release July 2001.

OBF #70 May 22-26, 2000 SMS/800 Number Administration Committee

Points Noted:

- 89. It was noted that the current plan for the 12.0 release is 2/24/01 as in the proposed plan the GA date for 12.0 release is July 2001.
- 90. It was noted that feedback from USTA had to be provided first before discussions regarding the code opening of 855 could continue.
- 91. It was noted that consensus had been reached for a code opening of 866 on July 29, 2000. The SMT is now looking for directions.
- 92. It was noted that the implementation of Concept #2A with 3 functional changes is ready for testing on August 21, 2000.
- 93. Jonnie Bond noted that AT& T supports the original code opening dates as proposed for September 2 and September 9, 2000.
- 94. It was noted that Concept #2A with 3 functional changes would be implemented by September 2, 2000 with a testing date starting on August 21, 2000.
- 95. In response to a question if the original date of November 2000 for the 12.0 release could be met it was noted that time had been lost because of the prioritization of implementing Concept #2A. It was further noted that if the SMT worked on the 12.0 release it would delay the implementation of Concept #2A.
- 96. The SMT asked if MGI changes were included in Concept #2A. In response it was noted no.

97. The following options for implementations were noted:

	Option	Implementation Date	Impacts to 855 implementation
1	Concept 2A with 4 changes12.0	≤ January 13, 2001	855 code opening on January 13, 2001
2	 Concept #2A with 3 functional changes 12.0 with 4th change 	September 2, 2000 January 13, 2001	855 code opening on > January 13, 2001+ 2weeks
3	Concept #2A with 4 changes12.0	November 4, 2000 January 13, 2001	> November 4, 2000
4	Option 2 with 4 th change not included	≤ January 13, 2001	> January 13, 2001
5	 Concept #2A with 3 functional changes 12.0 with 4th change 	September 2, 2000 January 13, 2001	> January 13, 2001

Agreements Reached:

14. The SNAC reached consensus not to implement the 855 code until at a minimum, Concept #2A with 3 options has been implemented.

AT&T objected to the implementation of code 866 on July 29, 2000 because the first-come, first-served reservation fix would not be available to SMS/800 users. Since the Industry has determined to move forward with 866 without the prescribed fix in place, then AT&T objects to holding 855 for the fix at a later date because of the negative impact to customer expectations. AT&T believes that the proposal presented on the May 12 conference call and associated contingency plan would meet the need <u>if</u> exhaust should ever occur. Further, the contingency fall back date as described (August 21, 2000) was only 2 weeks away from the agreed upon 866 implementation date (July 29, 2000).

WorldCom objected and stated they want to see all 4 options implemented prior to the 855 code opening.

15. The Committee reached consensus not to implement the 855 code until Concept #2A with 4 options has been implemented. Consensus has been reached.

AT&T objected to the implementation of code 866 on July 29, 2000 because the first-come, first-served reservation fix would not be available to SMS/800 users. Since the Industry has determined to move forward with 866 without the prescribed fix in place, then AT&T objects to holding 855 for the fix at a later date because of the negative impact to customer expectations. AT&T believes that the proposal presented on the May 12 conference call and associated contingency plan would meet the need <u>if</u> exhaust should ever occur. Further, the contingency fall back date as described (August 21, 2000) was only 2 weeks away from the agreed upon 866 implementation date (July 29, 2000).

Points Noted:

- 98. It was noted that the SCP owner/operators will meet at an early July meeting.

 Also a subsequent conference call will be scheduled.
- 99. Telcodia noted for Option 2 to allow more time for the code opening (+ 2 weeks).
- 100. A participant asked if the SNAC is willing to wait for the fix prior to opening 855 if the SNAC does not want to go with option 3 instead of option 1. It was further noted that if the code opening of 855 was delayed until the fix of first-come, first-served and such fix was implemented in the 12.0 release it would allow more time for "clean-up" after the 866 code opening.
- 101. WorldCom stated they wanted 855 implemented as soon as possible but also wanted Concept #2A with all 4 changes implemented.
- 102. WorldCom noted they would like to go with option 3 and put it in production in November of 2000 and open the codes 2 weeks later.

OBF #70 May 22-26, 2000 SMS/800 Number Administration Committee

Points Noted:

- 103. AT&T noted that a customer notification had been done for a September 2 and September 9, 2000 code opening. AT&T was looking for the first-come, first-served fix but now the dates have changed again to July 29, 2000. AT&T noted that previously new code openings had always been done a week apart, but AT&T supports waiting with the code opening for 855 to give time for "clean-up" after the opening of 866.
- 104. Sprint noted that the code opening has only been changed once and further stated it did not support AT&T's reasoning.
- 105. AT&T Canada stated that option 3 does not preclude the scenario AT&T would like to see.

Agreement Reached:

- 16. The SNAC came to consensus that Concept #2A with 4 functional changes will be implemented on November 4, 2000 and release 12.0 will be implemented on January 13, 2001. Consensus has been reached.
 - AT&T objected to the implementation of code 866 on July 29, 2000 because the first-come, first-served reservation fix would not be available to SMS/800 users. Since the Industry has determined to move forward with 866 without the prescribed fix in place, then AT&T objects to holding 855 for the fix at a later date because of the negative impact to customer expectations. AT&T believes that the proposal presented on the May 12 conference call and associated contingency plan would meet the need <u>if</u> exhaust should ever occur. Further, the contingency fall back date as described (August 21, 2000) was only 2 weeks away from the agreed upon 866 implementation date (July 29, 2000).

Features of 210 Release (Attachment 9)

Point Noted:

106. It was asked if the 12.0 release included the 4th option. (see change for Concept #2A where the GA date is November 4, 2000 with 3 changes and the 4th option. Release 12.0 GA is January 13, 2001 (current plan).

Agreement Reached:

- 17. The SNAC reached consensus to ask the SMT to incorporate the >32k records on SCP tape load in the 12.0 release to be implemented on January 13, 2001. Consensus has been reached.
- 18. The SNAC reached consensus on the code opening date for 855 on November 18, 2000.

OBF #70 May 22-26, 2000 SMS/800 Number Administration Committee

page 21 of 51

AT&T objected to the implementation of code 866 on July 29, 2000 because the first-come, first-served reservation fix would not be available to SMS/800 users. Since the Industry has determined to move forward with 866 without the prescribed fix in place, then AT&T objects to holding 855 for the fix at a later date because of the negative impact to customer expectations. AT&T believes that the proposal presented on the May 12 conference call and associated contingency plan would meet the need <u>if</u> exhaust should ever occur. Further, the contingency fall back date as described (August 21, 2000) was only 2 weeks away from the agreed upon 866 implementation date (July 29, 2000).

Additionally, AT&T believes that it is irresponsible to implement the 855 code on November 18, 2000 when the Release 12.0 is scheduled for implementation January 2001. This release contains features, which would improve system performance.

Points Noted:

- 107. A participant noted that all other system improvements should be put in place before the code opening.
- 108. It was noted that the >32k fix is only applicable when needed. The Output Load Management also will not be beneficial during the actual code opening. It was further noted that the weekly consumption will not increase and the large volume of records does not reflect RespOrg changes.
- 109. It was noted that 60 days are given for the spike.
- 110. A participant noted to look at the schedules regarding the NPA splits since the code opening dates have changed.
- 111. A participant noted support for Concept #2A with 4 changes at a later opening date.
- 112. It was noted that none of the prior conference calls contained discussions regarding allocation of numbers.
 - In response it was noted that the SNAC came to consensus on the code opening for 866 on July 29, 2000.
- 113. A participant noted that he would rather give the SMT more time to implement the 4 functional changes as reflected in Option 4 given there are enough resources in the pool.
- 114. A participant noted that the longer the delay of the 2nd code the staler the code opening. The participant stated a preference to open both codes within a short time frame. If no consensus could be reached then it would make sense to open the second code at a later date to give marketing departments more time to go back and reeducate the public.

Point Noted:

115. It was asked if the SMT had to have buy in from all SCP owner/operators and in response it was noted that the SMT could move forward if commitment was given by the majority of SCP owner/operators.

Action Item #2 of the May 12 conference call:

Judy Cook, Sprint will draft a letter informing the FCC that the SNAC agreed to a July 29, 2000 code opening without the implementation of the "first-come, first-served" fix (Concept #2A) and present the draft at the OBF #70.

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Points Noted

- 116. The SNAC held discussions regarding the letter draft to the FCC and the participants decided to not include a code opening date for 855 and discussions would continue during this session.
- 117. A participant noted that he wanted to finalize everything for the code opening of 866 before going ahead with the code opening date for 855.
- 118. The SMT noted that the fix of first-come, first-served is very important.
- 119. It was noted that the objective of the letter is to advise the FCC of a code opening for 866 on July 29, 2000 and that a date for code opening of 855 has not vet been set.
- 120. A participant noted her concern with the way the discussion was going. It was suggested to inform the FCC of a firm date for the code opening of 855 on July 29, 2000.
- 121. It was suggested to work on the letter later during the discussion on 855.
- 122. It was noted that the SNAC should show their concerns regarding the fix of first-come, first-served and take that into consideration for the code opening of 855 with the fix.

Action Item #3 of the May 12 conference call:

Megan Campbell, ATIS General Counsel, will contact Paul Hart, USTA and inform him of the SNAC's Agreement Reached #1 during this call. Megan will also inform Paul Hart that continuing discussions will take place during the OBF #70. Megan will ask Paul Hart if USTA could provide an answer regarding a two-week time frame of informing the RespOrgs prior to the scheduled June 14 (NSAC) meeting. The action item will be closed out on 5-23.